

August 10, 2018

Sent via Electronic Mail and Overnight Courier

Director, Emergency and Remedial Response Division
Attn: Chief, New Jersey Remediation Branch, Pohatcong Site
United States Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection
ATTN.: Fred Mumford
380 Scotch Road
West Trenton, New Jersey 08628
(*via electronic mail only*)

Re: Monthly Progress Report No. 22
Reporting Period July 1, 2018 through July 31, 2018
Operable Unit 3
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, this monthly progress report is submitted in compliance with section X, paragraph 30 of the CD and section IV.A of the Statement of Work for Remedial Design and Remedial Action for Operable Unit 3 (OU3 SOW)² of the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. As required by

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

² Pursuant to Section VI. Paragraph 12.c(1) of the CD, USEPA approval of the OU3 SOW was received on June 26, 2017.

the OU3 SOW, this report provides a description of the actions and activities undertaken pursuant to the CD during this reporting period and plans, actions and data scheduled in the next eight weeks.

Actions Taken toward Compliance with Consent Decree, including Community Relations

The following activities were performed during this reporting period:

- The installation of a new groundwater monitoring well at POHMW49 commenced during the previous reporting period on June 26, 2018 is ongoing.
- A call to discuss the results of the Pre-Design Investigation (PDI) drilling activities and SVE pilot testing was held with representatives of the USEPA, USACE, Rio Tinto, and Ramboll on July 2, 2018.
- The Monthly Progress Report for OU3 for the June 2018 reporting period was submitted to the USEPA on July 9, 2018.
- A call was held with representatives of the USEPA, the USACE and Ramboll was held on July 23, 2018 to discuss the proposed manner of construction of well POHMW49. Upon discussion with USEPA, it was decided to install this well as a shallow bedrock monitoring well with screen set at approximately 129 to 149 feet below ground surface.
- In a daily report of the drilling progress of July 26, 2018 and in e-mail correspondence from Ramboll to USEPA on July 27, 2018, due to difficulties in pulling the drill casing from the boring at the location of POHMW49 it was proposed to abandon this boring and to drill a new well location to install a well at POHMW49R. The location and manner of installation were approved by USEPA in e-mail correspondence the same day. Installation of boring for construction of new well POHMW49R commenced on July 30, 2018 and is ongoing.

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

- None.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- Analytical laboratory reports for packer test samples from the vertical groundwater profiling at monitoring well POHMW49 were received.
- Analytical laboratory reports for air samples collected from the soil vapor extraction pilot test were received.

Modifications to the OU3 Work Plans or Schedules

The following modifications to Work Plans for OU3 or other schedules proposed to USEPA were submitted during this reporting period:

- None.

Anticipated Plans, Actions and Data Scheduled, including Community Relations (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

- Completion of installation, well development and collection of a baseline groundwater sample from new monitoring well POHMW49 is planned.
- A Pilot/Treatability Study Evaluation (P/TSE) Report will be prepared and submitted to USEPA to summarize the results of the SVE pilot study.
- A Preliminary (30%) Design Report, which will include the results of the PDI, will be prepared and submitted to USEPA, anticipated in September 2018.

Estimate of the Percentage of the Work Completed

The following provides a qualified estimate of the percentage of the Work required by the CD that has been completed through this reporting period:

- Approximately 10% of the work required under the OU3 SOW has been completed to date.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None.

Closing

Pursuant to section X, paragraph.30 of the CD, three hard copies of this monthly progress report have been submitted to the designated recipients. If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

Luis Hidalgo
Project Coordinator

cc: *via electronic mail*
Michelle Grainger – USEPA, Region 2
Roy Duckett – Rio Tinto
Jeff Armington – Rio Tinto
Bruce White – Barnes & Thornburg LLP
Bruce Kennington – Ramboll